



Genova Burns LLC
494 Broad Street, Newark, NJ 07102
Tel: 973.533.0777 **Fax:** 973.533.1112
Web: www.genovaburns.com

Patrick W. McGovern, Esq.
Partner
Member of NJ and NY Bars
pmcgovern@genovaburns.com
Direct: 973-535-7129

April 30, 2018

VIA ECF – ELECTRONIC FILING

Honorable Paul A. Engelmayer, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

**Re: CONSENT MOTION FOR EXTENSION OF TIME TO MAY 31, 2018 FOR
ALL DEFENDANTS TO RESPOND TO COMPLAINT
Moore et al. v. New York Concrete Corporation et al., Civil Action No. 18-
2791**

Dear Judge Engelmayer:

Our Firm represents defendants New Leaf Development LLC and John Russo in the above matter.

I have conferred with Thomas Kennedy, counsel for Plaintiffs, and with James Terry, counsel for New York Concrete Corporation, and all parties have consented to an extension to and including May 31, 2018 of the time for all Defendants to respond to the Complaint in this Action.

According, all parties jointly request that the Court grant all Defendants an extension to and including May 31, 2018 to respond to the Complaint.

Respectfully submitted,

GENOVA BURNS LLC


PATRICK W. McGOVERN

PWM:BMP

c. All Counsel of Record (via ECF – Electronic Filing)